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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. CR 09-0026 WHA
)	
v.)	STIPULATION REQUESTING CHANGE-OF-
)	PLEA HEARING AND DELAY IN FILING OF
)	PRETRIAL CONFERENCE STATEMENT,
)	AND [PROPOSED] ORDER
TIMOTHY WASHINGTON,)	
)	
Defendant.)	
)	
)	
)	

The parties hereby stipulate as follows:

1. This matter is set for trial on April 13, 2009. The pretrial conference is set for April 6. Pursuant to Criminal Local Rule 17.1-1(b), the parties' pretrial conference statement is due on March 31.

2. Earlier today, defendant informed the United States that he intends to enter an open guilty plea to the offense charged in the indictment. Accordingly, the parties respectfully request that this case be placed on the Court's criminal calendar on April 1, 2009, at 1:30 p.m., for a change-of-plea hearing.

3. Since entry of a guilty plea by defendant would obviate the need for the parties to prepare and file a pretrial conference statement, the parties respectfully request that the Court continue until April 2 the deadline for filing the pretrial conference statement.

IT IS SO STIPULATED.

DATED: March 30, 2009

/s/
JAMES PHILLIP VAUGHNS
Attorney for Defendant

DATED: March 30, 2009

/s/
ANDREW P. CAPUTO
Assistant United States Attorney

[PROPOSED] ORDER

Pursuant to the stipulation of the parties, this matter is hereby placed on the Court's calendar for April 1, 2009, at 1:30 p.m., for a change-of-plea hearing. The parties shall have until April 2, 2009, to file the pretrial conference statement required by Criminal Local Rule 17.1-1(b).

IT IS SO ORDERED.

DATED: March 31, 2009

WILLIAM H. ALSUP
United States District Judge

